

Exhibit A

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1 **COMP**

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16 Attorneys for Plaintiffs

17 **OLIVER AND BEATRICE PREISS**

18
19 **IN THE EIGHTH JUDICIAL DISTRICT COURT**

20 **CLARK COUNTY, NEVADA**

21 OLIVER PREISS, an individual,
22 and BEATRICE PREISS, an individual;

23 Plaintiffs,

24 v.

25 S&R PRODUCTION COMPANY, a Nevada
Corporation; and ROY HORN AKA UWE
LUDWIG HORN AKA ROY UWE HORN, an
individual, DOES and ROES 1-100,

Defendants.

CASE NO.: A - 10 - 625477 - C

DEPT. NO.: XIX

**COMPLAINT
[EXEMPT FROM ARBITRATION-
EXTRAORDINARY RELIEF
REQUESTED]**

Oliver Preiss (hereinafter referred to as "Preiss" or "Plaintiff Preiss") and his wife
Beatrice Preiss (hereinafter referred to as "Beatrice" collectively referred to as "Plaintiffs"), for
causes of action against S&R Production Company (hereinafter referred to as "Defendant

1 "S&R") and Roy Horn (Hereinafter referred to as Defendant "Horn" collectively referred to
2 "Defendants"), hereby submit the following Complaint:

3 **GENERAL ALLEGATIONS**

- 4 1. At all times relevant herein, Plaintiffs were and are Nevada residents.
- 5 2. At all times relevant herein, Plaintiff Preiss was an employee of Defendant S&R
6 and Horn.
- 7 3. At all times relevant herein Plaintiff Preiss and Beatrice were husband and wife.
- 8 4. At all times relevant herein, Defendant S& R was a Nevada Corporation.
- 9 5. At all times relevant herein, Defendant Horn was a Nevada resident.
- 10 6. All events giving rise to this suit occurred in Clark County, Nevada.
- 11 7. All the acts and/or failures to act alleged herein were duly performed by and/or
12 are attributable to Defendant, acting by and through their agents and employees. Said acts and/or
13 failures to act were within the scope of said agency and/or employment, and the Defendants
14 ratified said acts and/or omissions.
- 15
- 16 8. DOES and ROES 1-100 are persons, corporations or partnerships whose true
17 names, identifies and capacities are unknown to Plaintiff at this time. Said DOE and ROE
18 Defendants are responsible for, or controlled, directed or ratified the injurious activities of named
19 Defendant and/or are responsible for the unlawful actions taken against and/or injuries suffered
20 by Plaintiff and all others similarly situated. Plaintiff alleges that each named Defendant and
21 said DOE and ROE Defendants negligently, willfully, intentionally, maliciously, recklessly,
22 vicariously or otherwise, caused, directed, allowed or set in motion the unlawful and injurious
23 events affecting Plaintiff. Plaintiff will ask leave of this Court to insert the true names and
24
25

1 capacitates for said DOE and ROE Defendants when discovered and to substitute those true
2 names as Defendants into these proceedings.

3 9. This case involves an employee's claims of, inter alia, sexual harassment, hostile
4 work environment, quid pro quo, loss of consortium, assault and battery.

5 10. Plaintiff Preiss is a German citizen who came to the U.S. in 2008. He operated a
6 tour company, German Las Vegas Service, see www.germanlasvegasservice.de, specializing in
7 tours of Las Vegas for German visitors.

8 11. Plaintiff Preiss' business is debt free.

9 12. Defendant S&R is a company owned by the entertainers Siegfried Fischbacher
10 and Roy Horn.

11 13. On information and belief, Defendant S&R has more than 15 employees.

12 14. Defendant S&R operates, or is affiliated with, a variety of companies, including:
13 (1) Siegfried & Roy Enterprises, Inc., (2) Siegfried & Roy Foundation, Inc.; and (3) S&R
14 Presents.

15 15. In addition, Defendant Horn appears to operate in his individual name as "Roy
16 Uwe Horn or Siegfried Fischbacher c/o Lexington Financial Management, LLC."

17 16. On information and belief, all of these entities have interrelated operations and a
18 common management, centralized control of labor relations, and common ownership and
19 financial control. Most importantly, the beneficial owners of all these entities, including
20 Defendant Horn, have ultimate control over the terms and conditions of employment
21 relationships.
22

23 17. Defendant Horn is an entertainer and part of "Siegfried & Roy" who performed in
24 Las Vegas until a tiger injured him on stage in 2003.
25

1 18. Despite the injuries suffered during the tiger attack, Defendant Horn still has full
2 strength in his right arm.

3 19. Defendant Horn has a group of male employees assisting him around the clock.
4 The assistants help Horn with all his daily needs, for example getting dressed, grooming, and
5 running errands.

6 20. All assistants are physically smaller than Defendant Horn.

7 21. In May 2008, during one of Preiss' tours, Preiss met Siegfried Fischbacher in the
8 street. Fischbacher invited Preiss to visit.

9 22. Shortly thereafter, Preiss began working for S&R.

10 23. Initially, he worked only sporadically.

11 24. Gradually, Defendant Horn requested Preiss to work more frequently and more
12 hours. Eventually, this became full-time employment for Preiss.

13 25. At all times relevant herein, Defendants had the right and did control when, were
14 and how Plaintiff performed his job.

15 26. The work Plaintiff performed did not require Plaintiff's expertise.

16 27. Plaintiff is a highly trained Physical Therapist, but during the employment
17 relationship performed like any other of the assistants, such as dressing Horn, running errands,
18 making travel arrangements, and accompanying him to doctor's appointments, shopping, and on
19 international trips.

20 28. Defendants provided all tools, materials and equipment for the performance of
21 Plaintiff's job.

22 29. The work was performed on Defendants' premises and at locations specified by
23 Defendants.
24
25

1 30. There was an ongoing employment relationship for approximately two years
2 between Plaintiff Preiss and Defendants.

3 31. Plaintiff did not hire and pay assistants. In fact, all other assistants were hired
4 through a specialized agency.

5 32. Plaintiff did not engage in his distinct occupation or business, which was a tour
6 company in Las Vegas, as part of his employment.

7 33. Defendants had the ability to discharge Plaintiff and in fact did so in the end.

8 34. Because of the time demands of his employment with Defendant S&R, Preiss
9 gradually discontinued his tour company.

10 35. He was unable to work the required hours for Defendants and at the same time
11 maintain his tour business.

12 36. Thus, his business lost the income it would have otherwise generated, the good
13 will it had developed, its referral network, and other contacts.

14 37. At this point, Plaintiff Preiss' business has lost virtually all value because of the
15 many months of inactivity. Plaintiff's financial losses exceed \$100,000.00.

16 38. Early on, both Fischbacher and Horn made sexual overtures that Preiss rebuked.
17 After a few unsuccessful attempts, Fischbacher discontinued his requests for sexual favors.

18 39. Defendant Horn however, continued to make requests for sex.

19 40. During the course of his employment, Preiss gradually became aware through
20 personal observation that Defendant Horn made sexual advances towards all male assistants.

21 41. Defendant Horn forced his assistants to join him in watching pornographic videos
22 at night.
23
24
25

1 42. Beginning in January 2010, Defendant Horn's request to Plaintiff for sexual
2 favors were more insistent, and Defendant Horn began groping Preiss' genitals and nipples,
3 inside and outside of Preiss' clothing.

4 43. Preiss felt apprehension as a result of this offensive contact.

5 44. Defendant Horn often requested a massage of his nipples. Preiss consistently
6 refused.

7 45. Defendant Horn ordered Preiss repeatedly to touch Horn's penis. Preiss
8 consistently refused.

9 46. Upon hearing Plaintiff Preiss' refusal, Defendant Horn became angry and told
10 Plaintiff to "leave his house" or to quit working for him and that Preiss should leave if he does
11 not provide the requested sexual service.

12 47. Preiss is heterosexual and married.

13 48. Preiss repeatedly made to Defendant Horn that the sexual assaults and sexual
14 harassment perpetrated by Defendant Horn were intolerable and unwelcome.
15

16 49. During the course of his employment, Preiss learned that Defendant Horn's sexual
17 assaults of employees were rampant. At least one of the employees, M., provided full-fledged
18 sex to Horn. M. is the assistant who has been there the longest.

19 50. Defendant Horn's unwelcome sexual advances and sexual assaults put great strain
20 on Preiss' marriage relationship as it caused him anxiety and disturbed the interaction with his
21 wife.

22 51. In April 2010, the situation at the workplace became untenable as Defendant
23 Horn's groping and assaults became more insistent, and Preiss refused to provide the requested
24 sex acts.
25

1 52. Defendant Horn, apparently finally convinced that Plaintiff Preiss was unwilling
2 to engage in sexual conduct with him, told Preiss to stay home and quit coming to work.

3 53. On or about April 28, 2010, Defendant Horn requested that Preiss return the keys
4 to the premises.

5 54. Preiss was never again returned to work and as a result has been discharged.

6 55. Surveillance videos of the workplace show rampant sexual harassment, sexual
7 assaults, lewd and lascivious conduct, as well as unwanted forced sexual groping of, and
8 offensive physical contact with, multiple male employees. They show sodomy with at least one
9 of the employees, identified here only by his initial M.

10 56. The videos show Defendant Horn manhandling some of the substantially smaller
11 assistants. For example, one of the videos shows Defendant Horn violently slapping around
12 assistant P. (the smallest of the assistants at the time), and forcibly kissing P. on the mouth.

13 57. When Preiss' wife Beatrice saw the surveillance videos, it increased marital
14 tensions as it showed Preiss, among other victims, being treated as a sex object by Horn.
15 Learning about the sexual abuse at the hands of Defendant Horn, involving her very own
16 husband, caused Plaintiff Beatrice Preiss extreme emotional distress.

17 58. Defendants' actions put extreme pressure on the Plaintiffs' marriage, and caused
18 multiple arguments and sleepless nights.

19 59. Plaintiff Preiss is in medical treatment as a result of the sexual harassment, and on
20 anxiety medication. He is suffering from extreme anxiety, depression and insomnia.

21 60. Subsequent to leaving the S&R employment, because of extreme anxiety, Preiss
22 secured his home with multiple alarm systems, security cameras, and bullet-proof windows, at a
23 cost of approximately \$30,000.
24
25

1 61. On June 1, 2010, Preiss filed a complaint with the Equal Employment
2 Opportunity Commission (EEOC) in Las Vegas. The EEOC thereafter issued a right to sue letter.

3 **FIRST CAUSE OF ACTION**
4 **(Unlawful Sexual Harassment**
5 **and Discrimination Under Title VII-Against Defendant S&R)**

6 62. Plaintiff repeats and incorporates herein the allegations of paragraphs 1 through
7 61 as though fully set forth below.

8 63. Under Title VII it is unlawful for an employer to discriminate against any
9 individual with respect to his compensation, terms, conditions or privileges of employment
10 because of such individual's sex.

11 64. S&R discriminated against Plaintiff because of his sex through sexual harassment
12 (both hostile environment and tangible job action sexual harassment), and the tangible job
13 actions and adverse employment actions taken against him.

14 65. As a result of the unlawful conduction in violation of Title VII's prohibition
15 against sex discrimination, Plaintiff has suffered losses, including but not limited to, the loss of
16 employment, substantial loss of pay, and loss of reputation and emotional distress. Also, Plaintiff
17 reduced his other business activity to zero in order to serve S&R and Horn.

18 66. Plaintiff is entitled to a declaratory judgment that the actions of S&R and Horn
19 violated Title VII.

20 67. As a result of Defendant's conduct, Plaintiff has been damaged in an amount in
21 excess of \$10,000.00.

22 68. Additionally, the conduct of Defendant and its employees has been malicious,
23 fraudulent and oppressive and was designed to vex, annoy or harass Plaintiff and thus Plaintiff is
24 entitled to punitive damages under Title VII in amount in excess of \$10,000.00.
25

1 69. As a result of Defendant's discriminatory acts as alleged herein, Plaintiff is
2 entitled to his attorneys' fees and costs of suit as provided by Title VII, 42 U.S.C. §2000e - 5(k).

3 **SECOND CAUSE OF ACTION**
4 **(Hostile Work Environment in Violation of Title VII-Against Defendant S&R)**

5 70. Plaintiff incorporates herein the allegations of paragraphs 1 through 69 as though
6 fully set forth below.

7 71. Plaintiff was subjected conduct of a sexually harassing nature as detailed above.

8 72. The conduct to which Plaintiff was subjected was unwelcome.

9 73. The conduct detailed above was sufficiently severe and pervasive and did alter
10 the conditions of Plaintiff's work environment and created an abusive working environment.

11 74. As a result, Plaintiff has been damaged.

12 75. Plaintiff is entitled to a declaratory judgment that the actions of S&R and Horn
13 violated Title VII.

14 76. As a result of Defendant's conduct, Plaintiff has been damaged in an amount in
15 excess of \$10,000.00.

16 77. Additionally, the conduct of Defendant and its employees has been malicious,
17 fraudulent and oppressive and was designed to vex, annoy or harass Plaintiff and thus Plaintiff is
18 entitled to punitive damages under Title VII in amount in excess of \$10,000.00.

19 78. As a result of Defendant's discriminatory acts as alleged herein, Plaintiff is
20 entitled to his attorneys' fees and costs of suit as provided by Title VII, 42 U.S.C. §2000e - 5(k).

21 **THIRD CAUSE OF ACTION**
22 **(Quid Pro Quo Hostile Work Environment-in violation of Title VII**
23 **-Against Defendant S&R)**

24 79. Plaintiff incorporates herein the allegations of paragraphs 1 through 78 as though
25 fully set forth below.

1 80. At all times relevant herein, Plaintiff was a member of protected class.

2 81. At all times relevant herein, Plaintiff was subjected to unwelcome sexual
3 harassment in the form of sexual advances and requests for sexual favors because of his male
4 gender as detailed above.

5 82. At all times relevant herein, Plaintiff's submission to the unwelcome advances
6 was an express and implied condition of his continued employment.

7 83. Plaintiff's refusal to comply with the unwelcome sexual advances and requests for
8 sexual favors resulted in a tangible job detriment as Plaintiff was terminated.

9 84. Plaintiff is entitled to a declaratory judgment that the actions of S&R and Horn
10 violated Title VII.

11 85. As a result of Defendant's conduct, Plaintiff has been damaged in an amount in
12 excess of \$10,000.00.

13 86. Additionally, the conduct of Defendant and its employees has been malicious,
14 fraudulent and oppressive and was designed to vex, annoy or harass Plaintiff and thus Plaintiff is
15 entitled to punitive damages under Title VII in amount in excess of \$10,000.00.

16 87. As a result of Defendant's discriminatory acts as alleged herein, Plaintiff is
17 entitled to his attorneys' fees and costs of suit as provided by Title VII, 42 U.S.C. §2000e - 5(k).

18
19 **FOURTH CAUSE OF ACTION**
20 **(Assault and Battery-Against All Defendants)**

21 88. Plaintiff incorporates herein the allegations of paragraphs 1 through 87 as though
22 set forth fully below.

23 89. Defendant Horn subjected Plaintiff to a harmful and offensive touching as
24 detailed above.

1 90. The unlawful acts of Defendant Horn caused Plaintiff to reasonably apprehend an
2 injury or offensive bodily contact.

3 91. Defendant Horn's conduct cause Plaintiff physical harm and to cause him to
4 suffer insulting or provoking contact.

5 92. Defendant S&R is liable to Plaintiff for the assault and battery committed by
6 Defendant Horn by virtue of the doctrine of *Respondeat Superior*.

7 93. Plaintiff has suffered damages from Defendants' tortious conduct, including
8 economic, pecuniary and emotional distress damages in excess of \$10,000.00.

9 94. Additionally, the conduct of Defendant and its employees has been malicious,
10 fraudulent and oppressive and was designed to vex, annoy or harass Plaintiff and thus Plaintiff is
11 entitled to punitive damages in excess of \$10,000.00.

12 95. As a direct and proximate result of Defendants' conduct, Plaintiff has been forced
13 to file legal action and thus is entitled to his attorney's fees and costs.

14
15 **FIFTH CAUSE OF ACTION**
16 **(Intentional Infliction of Emotional Distress-Against all Defendants)**

17 96. Plaintiff incorporates herein the allegations of paragraphs 1 through 95 as though
18 set forth below.

19 97. Defendant Horn's actions go beyond all possible bounds of decency, and are
20 atrocious and utterly intolerable.

21 98. Plaintiff is in treatment and on anti-anxiety medication as a result of Defendants'
22 conduct.

23 99. The actions of Defendants against Plaintiff described above were designed to
24 inflict severe emotional distress upon Plaintiff and did inflict severe emotional distress upon
25 Plaintiff.

1 100. Defendant S&R is liable to Plaintiff for the acts committed by Defendant Horn by
2 virtue of the doctrine of *Respondeat Superior*.

3 101. Plaintiff has suffered damages from Defendants' tortious conduct, including
4 economic, pecuniary and emotional distress damages in excess of \$10,000.00.

5 102. Additionally, the conduct of Defendant and its employees has been malicious,
6 fraudulent and oppressive and was designed to vex, annoy or harass Plaintiff and thus Plaintiff is
7 entitled to punitive damages in excess of \$10,000.00.

8 103. As a direct and proximate result of Defendants' conduct, Plaintiff has been forced
9 to file legal action and thus is entitled to his attorney's fees and costs.

10 **SIXTH CAUSE OF ACTION**
11 **(Negligent Infliction of Emotional Distress-on behalf of Plaintiff Priess and Beatrice-**
12 **Against all Defendants)**

13 104. Plaintiff incorporates herein the allegations of paragraphs 1 through 103 as though
14 set forth below.

15 105. Defendant Horn engaged in intentional, severe and outrageous behavior as set
16 forth above.

17 106. Beatrice and Plaintiff are husband and wife and thus Beatrice is closely related to
18 Priess.

19 107. The sexual assaults and other improper sexually charged acts of Defendant Horn
20 against Plaintiff and others, as described above, severely affected Plaintiff's wife, Beatrice
21 Preiss, and led to marital discord.

22 108. Additionally, Beatrice Preiss was emotionally injured by the contemporaneous
23 sensory observance of the sexual harassment and the impact it had on her husband; suffered
24 extreme and severe emotional distress and resulting physical symptoms.
25

1 109. Defendants' actions put extreme pressure on the Plaintiffs' marriage, and caused
2 multiple arguments and sleepless nights.

3 110. Plaintiff Oliver Preiss is in medical treatment and anxiety medication and
4 therefore also suffered extreme and severe emotional distress with resulting physical symptoms.

5 111. Pursuant to NRS 616C.180(3)(c), harm caused by layoff, termination or discipline
6 of an employee is not compensable through worker's compensation statutes and thus Preiss'
7 claim is not preempted.

8 112. Defendant S&R is liable to Plaintiff for the acts committed by Defendant Horn by
9 virtue of the doctrine of *Respondeat Superior*.

10 113. Plaintiffs, and each of them, have suffered damages from Defendants' tortious
11 conduct in an amount in excess of \$10,000.00.

12 114. As a direct and proximate result of Defendants' conduct, Plaintiffs have been
13 forced to file legal action and thus are entitled to their attorney's fees and costs.

14
15 **SEVENTH CAUSE OF ACTION**
16 **(Unlawful Retaliation In Violation of Title VII-against S&R)**

17 115. Plaintiff incorporates herein the allegations of paragraphs 1 through 114 as though
18 set forth below.

19 116. Priess engaged in protected activity when he complained of/opposed Defendant
20 Horn's conduct.

21 117. Defendant retaliated against Plaintiff by terminating him.

22 118. Plaintiff's termination is a direct result of his opposition/complaints regarding
23 Defendant's Horn's conduct and this is causally connected.

24 119. As a result of the unlawful conduct, of the violations of Title VII's prohibition
25 against retaliation, Plaintiff suffered damages in an amount in excess of \$10,000.00.

1 120. Plaintiff is entitled to a declaratory judgment that the actions of S&R and Horn
2 violated Title VII.

3 121. As a result of Defendant's conduct, Plaintiff has been damaged in an amount in
4 excess of \$10,000.00.

5 122. Additionally, the conduct of Defendant and its employees has been malicious,
6 fraudulent and oppressive and was designed to vex, annoy or harass Plaintiff and thus Plaintiff is
7 entitled to punitive damages under Title VII in amount in excess of \$10,000.00.

8 123. As a result of Defendant's discriminatory acts as alleged herein, Plaintiff is
9 entitled to his attorneys' fees and costs of suit as provided by Title VII, 42 U.S.C. §2000e - 5(k).

10 **EIGHTH CAUSE OF ACTION**
11 **(Loss of Consortium-on behalf of Beatrice-Against All Defendants)**

12 124. Plaintiff incorporates herein the allegations of paragraphs 1 through 123 as though
13 set forth below.

14 125. By virtue of Defendant Horn's conduct, Beatrice as been deprived of the love,
15 companionship, affection, society, solace and/or more of her husband.

16 126. Because of Defendant Horn's conduct, the relationship between Beatrice and her
17 husband has been damaged.

18 127. Pursuant to NRS 616C.180(3)(c), harm caused by layoff, termination or discipline
19 of an employee is not compensable through worker's compensation statutes and thus this
20 derivative claim is not preempted.

21 128. Defendant S&R is liable to Plaintiff for the acts committed by Defendant Horn by
22 virtue of the doctrine of *Respondeat Superior*.

23 129. As a result of Defendant Horn's conduct, Beatrice has been damaged in excess of
24 \$10,000.00.
25

1 130. As a result of Defendant Horn's conduct, Beatrice has been forced to bring legal
2 action and thus is entitled to her attorney's fees and costs.

3 **PRAYER FOR RELIEF**

4 **WHEREFORE**, Plaintiffs prays judgment against Defendants as follows:

- 5 1. That a declaratory judgment be issued declaring that the actions of Defendants
6 violated Title VII and that Plaintiff be awarded injunctive relief under Title VII;
- 7 2. That judgment be entered in favor of Plaintiff and jointly and severally against
8 S&R and Horn, awarding Plaintiff all remedies available under Title VII,
9 including but not limited to, front pay, back pay, compensatory damages, punitive
10 damages, interest, fees and costs;
- 11 3. That Plaintiffs be awarded their costs and attorneys' fees for all costs and fees
12 incurred in connection with this matter;
- 13 4. That Plaintiff be awarded judgment of compensatory and punitive damages on his
14 claims;
- 15 5. That Beatrice be awarded all compensatory, special and other damages allowed
16 with respect to her claims;
- 17 6. That Plaintiffs be awarded such other and further relief that the Court deems just
18 and equitable;
- 19

20 //

21 //

22 //

23 //

1 7. That the Court retain jurisdiction over Defendants until such time as it is satisfied
2 that they have fully remedied the practices complained of and are determined to
3 be in full compliance with the law and that all amounts awarded are paid to
4 Plaintiff by Defendants.

5 Dated this 17 day of September, 2010.

6 NELSON LAW

7 

8 SHARON L. NELSON
9 Nevada Bar No. 6433
10 401 N. Buffalo, Suite 100
11 Las Vegas, Nevada 89145
12 Attorneys for Plaintiff

13 MIKE MEIER

14 *To be admitted pro hac vice*
15 INTERNATIONAL LAW GROUP, LLC
16 6525 76th Street
17 Cabin John, MD 20818

18 Attorneys for Plaintiffs
19 OLIVER AND BEATRICE PREISS
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DEMAND FOR JURY TRIAL

Plaintiff hereby demands trial by jury.

Dated this 17 day of September, 2010.

NELSON LAW



SHARON L. NELSON

Nevada Bar No. 6433

401 N. Buffalo, Suite 100

Las Vegas, Nevada 89145

Attorneys for Plaintiff

MIKE MEIER

To be admitted pro hac vice

INTERNATIONAL LAW GROUP, LLC

6525 76th Street

Cabin John, MD 20818

Attorneys for Plaintiffs

OLIVER AND BEATRICE PREISS

Exhibit B

Hello Randy,

First of all I would like to let you know that I came here from Germany with my own idea for a business as a german tour guide service.

Before I met Mr. Roy I already paid my house and all of my five cars in cash by myself. This I tell you only to make clear that I already came to Las Vegas as a successful person.

My feeling is it that you misjudge my person without knowing my past. You make fun of me and my education (email between Sharon and you) without knowing what my abilities mean for Mr. Roy.

Now after more than a year and after we finally decided (it was my wish) to make my payments official and you are able to set my service off against tax liability NOW you're asking me to work for a lower fee? That sounds unbelievable to me. Even that I know that other persons (Luis) got much more money per hour (\$120 plus gas) without any kind of experience like me. Just like I only charge Mr. Roy for a maximum of 5 hours a day whether I have to come twice a day (total of 80 miles/2h 40min running time) or if I'm there for more than 5 hours (sometimes up to 12 hours). And with this in mind you'll see I get less than \$40 per hour. That I charge Mr. Roy for not more than 5 hours a day was my own generous thought. This was the minimum of income in Euro when I worked in Germany as a self employed physical therapist.

I can't imagine that Mr. Roy complained about my payment and I would like to make sure that I only work personally for Mr. Roy. I'm not employed by you or the S&R office. My only boss is Mr. Roy himself. For him I'm always available and helpful. If he doesn't need my service any more then I go back to my tour business and get also \$100 per hour without using my own car.

The only "compromise" I would make is to go down to \$80 per hour plus travel costs(\$25/appointment) and the total hours I work for Mr. Roy. But you'll see this would be much more money for Mr. Roy.

PREISS0089

Exhibit C



7 May 2010

Mr. Roy Horn
c/o S & R Executive Office
1639 N. Valley Drive
Las Vegas, NV 89108
Via facsimile (702) 648-0519 & Certified Mail

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MIKE MEIER (DC, MD, VA, NY)
MARCUS EHRHART (FLC, NY)
MATTHEW R. JOSEPH (NY, DC)
GEORGE NELSON (VA)

RE: Services by Mr. Oliver Preiss

Dear Mr. Horn:

Our law firm represents Mr. Oliver Preiss. From the prior communications exchanged between your representatives and Mr. Preiss, it appears that the relationship has deteriorated. Mr. Preiss has certain grievances at this point:

- (1) Mr. Preiss' invoice of \$2,750 has not yet been paid.
- (2) Mr. Preiss has served you loyally and faithfully, making himself available whenever you needed him - anytime. In fact, to serve you better, he stopped operating his tour bus business.
- (3) Without going into too much detail, it appears that the work environment has been hostile, and there is physical evidence to support that.
- (4) Mr. Preiss has suffered severe financial losses by serving you, to the detriment of his own business. In fact, he has nothing at this point because he relied on you.

To resolve these grievances amicably, we propose a settlement of \$500,000 (five hundred thousand dollars). We are open to confidential mediation.

I look forward to hearing from you or your attorney.

Sincerely,

INTERNATIONAL LAW GROUP, LLC


A handwritten signature in black ink, appearing to read "Mike Meier". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Mike Meier

Exhibit D



BRAD TRASHES ANGELINA
His rage over new tell-all book

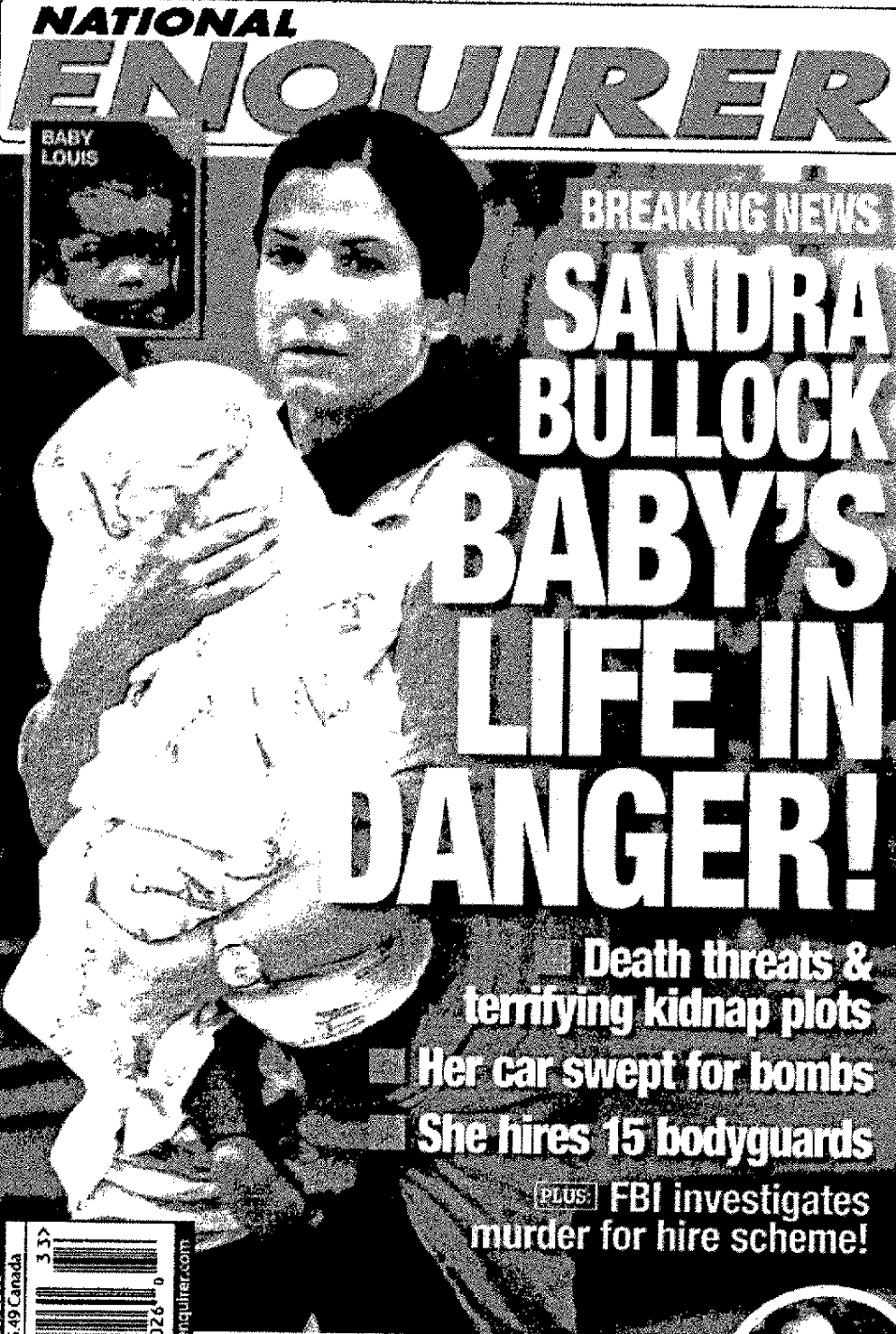


SIEGFRIED & ROY SHOCKER!
Roy caught on video soliciting GAY sex



CHELSEA'S SECRET COLLAPSE!
Hours before wedding

NATIONAL ENQUIRER




BREAKING NEWS
SANDRA BULLOCK BABY'S LIFE IN DANGER!


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- Her car swept for bombs
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PLUS: FBI investigates murder for hire scheme!

BABY LOUIS



NICOLE RICHIE SNAPS
- Joel chooses work over marriage



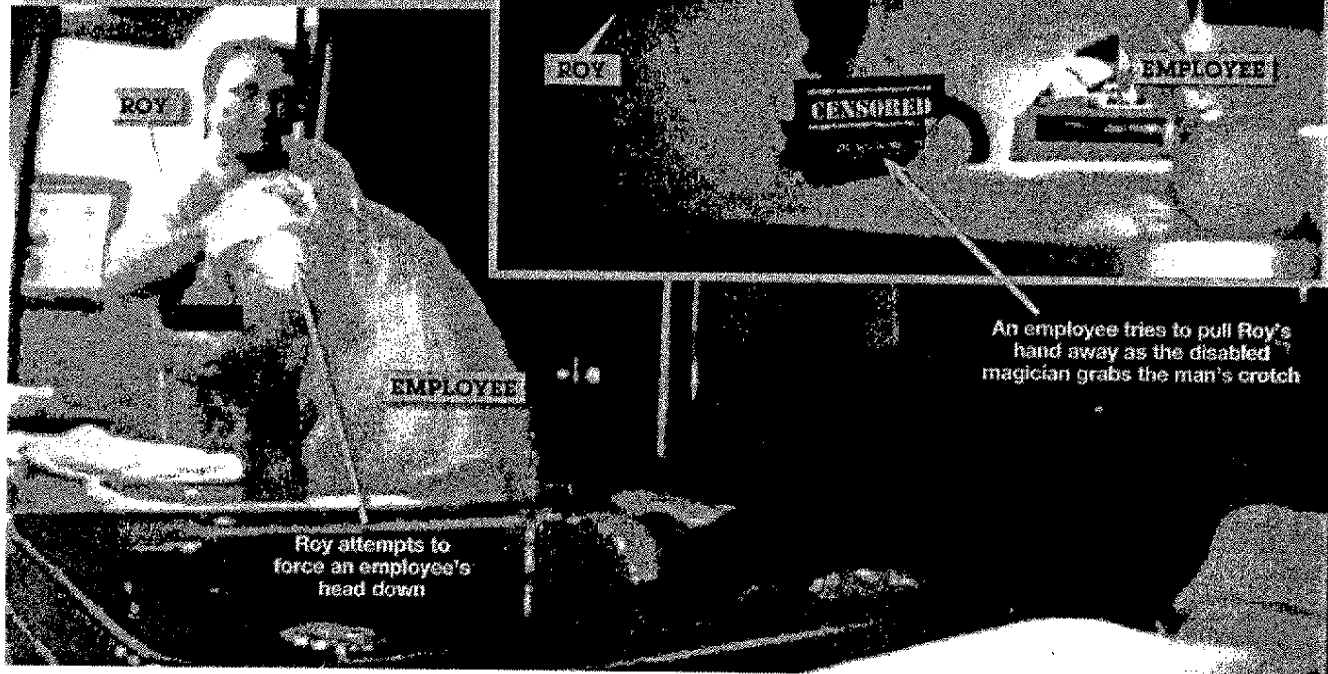
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ENQUIRER EXCLUSIVE

Siegfried & Roy SEX SHOCKER!

Videotape shows
injured magician
groping & fondling
male assistants

2009/04/



An employee tries to pull Roy's
hand away as the disabled
magician grabs the man's crotch

Roy attempts to
force an employee's
head down

questions about their sexuality -
made sexual advances toward him.

"Siegfried backed off when I
made it plain that I was straight
and not interested, but Roy did
not," divulged the ex-employee,
who's now under psychiatric care.

"Roy's unwanted sexual advances
got progressively worse, severe and
frequent beginning in January of this
year. It was a very vile situation, and
I felt degraded and abused.

"I never thought that I could be the
victim of sexual harassment. I never

imagined that my boss, another man,
could be in such a position of power,
both financially and psychologically,
over me."

The man claims Roy's behavior
has caused lasting damage to his
everyday life and mental health.

"This abuse has placed an enor-
mous strain on my marriage and my
personal relationship with my wife. I
now suffer extreme anxiety, depres-
sion and insomnia," he divulged.

by JOHN BLOSSER

jblosser@nationalenquirer.com

ROY HORN - one half of Las Vegas' famed Siegfried & Roy duo - has been accused of sexually assaulting his male assistants...and the attacks have been captured on film!

The ENQUIRER exclusively obtained a shocking videotape that shows Roy groping, fondling and sexually harassing his male employees. And a legal expert calls it criminal behavior that could put the entertainer - crippled in 2003 by one of his legendary white tigers - behind bars for up to 10 years!

One former assistant has already filed a sexual harassment complaint with the Equal Employment Opportunity Commission (EEOC), and plans to slap Roy with a civil lawsuit seeking substantial monetary damages, according to his attorney Mike Meier.

"Roy Horn's sexual advances became unbearable, and began to take on the shape of unprovoked sexual attacks" the ex-employee - a straight man who's married with children - told The ENQUIRER.

"He ordered me to touch his genitals and groped me repeatedly, both inside and outside my pants. He also threatened to fire me if I didn't comply with his demands. In the end, I quit because of the harassment."

THE ENQUIRER IS NOT RELEASING the ex-employee's name because he wants to remain anonymous at this time. But if his lawsuit is upheld, "the scandal threatens to destroy Siegfried and Roy's popular image with their legions of fans,"

ENQUIRER - filmed by a hidden camera installed in Roy's bedroom by one of his workers - shows assistants helping Roy from his bedroom to the bathroom.

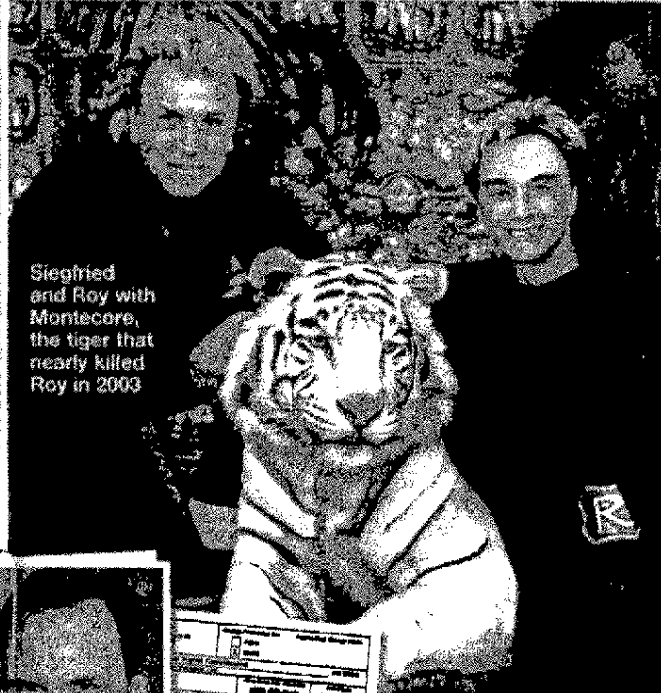
On the tape, Roy is seen locking his right arm around their throats, and then forcing his hand inside their shirts and down their pants, grasping at their private parts, as they struggle to fend him off. He also tries to force their heads between his legs.

"Roy may be handicapped, but his right arm is very strong," said the ex-employee. "Once he gets that arm around you, you're at his mercy."

Roy's behavior on the tape "is a crime and a felony under Nevada law. It can be considered an assault," attorney Sharon Nelson, founding partner of Nelson Law in Las Vegas, a firm specializing in sexual harassment, told The ENQUIRER.

"This could be prosecuted as criminal behavior and carry a penalty of one to ten years in prison, depending on how severe or egregious it is perceived to be. I would encourage them to file a police report."

Attorney Meier of International Law Group filed the EEOC complaint on



Siegfried and Roy with Montecore, the tiger that nearly killed Roy in 2003

U.S. District Court
District of Nevada
Case No. 10-00000
Filed 04/08/11

Attorney Mike Meier filed a complaint on behalf of his client

Beginning in or about 01/2010, I was subjected to sexual harassment by Roy Horn in that he asked me to touch him and he groped me repeatedly. I asked Mr. Horn to stop and he threatened my employment. Finally, I could no longer endure the sexual harassment and felt compelled to quit my employment.

I believe that I was sexually harassed and discriminated against because of my sex, Male, in violation of Title VII of the Civil Rights Act of 1964, as amended.

filed with the EEOC states: "I was subjected to sexual harassment by Roy Horn in that he asked me to touch him and he groped me repeatedly. I asked Mr. Horn to stop and he threatened my employment."

The ex-employee chose not to report Roy's actions to Las Vegas police because "in a criminal proceeding, the victim never gets fully compensated. The purpose of a civil proceeding is to compensate the person who suffered the loss," Meier said.

"Since Siegfried and Roy have shown no interest in settling out of court, we are forced to file a civil suit."

a source told The ENQUIRER. Roy, 65, and his partner Siegfried Fischbacher, 71, earned millions as one of the biggest shows in Vegas until Roy was attacked at the Mirage seven years ago by Montecore, a 600-pound white tiger. Roy suffered severe injuries that required several operations and extensive rehab. A team of male assistants now care for him around the clock at his palatial home in Las Vegas.

The videotape obtained by The

ENQUIRER - filmed by a hidden camera installed in Roy's bedroom by one of his workers - shows assistants helping Roy from his bedroom to the bathroom.

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SEVERAL MORE FORMER employees who quit due to Roy's sexual assaults are expected to join in the lawsuit, according to Meier.

"With so many victims, if you add up damages and mental anguish, it is potentially a multimillion-dollar lawsuit," said Meier, who plans to file the civil suit within weeks if no settlement is reached.

The former employee worked for Roy for two years beginning in May 2008. He says both Siegfried and Roy - who have long ducked

Exhibit E

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The Siegfried and Roy Scandal: Did you wonder how Roy got caught on video? Heres the answer: aparently there was money stolen and Roy had the cameras installed to see who the robber is. This is a video of Roy looking at the videos with employees. More cutting egde celebrity news at www.bollywood.com!

Category:
Entertainment

Tags:
Siegfried and Roy Scandal how Roy got caught on video

All Comments (9)

see all

Respond to this video...

This is the text of the complaint: abcnews.go.com/Entertainment/page?id=11690215
RosalieJohnston 1 month ago

Folks: check out the complaint in that lawsuit, ABC new published it: abcnews.go.com/entertainment/page?id=11690215
RosalieJohnston 1 month ago

Hey guys, I just found some of the pictures from the National Enquirer on the internet, I just googled Siegfried and Roy scandal National Enquirer in images. I think these are some of the pics showing Roy groping his male workers.
MrJDrover 1 month ago

Whoa! That explains a lot. That is really funny, he wanted to catch a thief and then he himself was caught sexually harassing employees!
MrJDrover 1 month ago

Wow! I never thought they would do such things. Does anybody know more about that law suit?
DesireeGonzalez34 2 months ago

Wow! I never thought they would do such things. Does anybody know more about that law suit? I only saw the pictures from the National Enquirer.
DesireeGonzalez34 2 months ago

© TheCelebrityNow: I think thiere is more stuff coming because other victims of the scandal have gone to the Equal Employ Oportunity Commision, EEOC, and filed complaints. More news soon.
TheCelebrityNow 2 months ago

Suggestions

Mike In The Window

by downy

31,502 views

Promoted Video

Bollywood Mix Maal

by Sagar813lul

121 views

BOWCHICKABOWWOW!

(4.23.10 - Day 358)

by CTFxC

392,755 views

Miley Cyrus Named Worst Celebrity Influence of ...

by cleverTV

41,494 views

Yeh Mera Dil - Don: The Chase Begins Again 2006

by BollywoodNasha

559 views

Razer - Man of Pleasure

by blacklie18

903 views

Celebrity Thanksgiving Plans 2010

by HollyscoopTV

571 views

batman vs the green hornet (bruce lee) 1 of 4

by melamane

96,653 views

Sports Science: "World Record Kick to the Groin..."

by rockboy1138

1,461,148 views

AB OfficeStress2 1

by shahzadkhatri

134 views

The funniest video ever!!

by johannz

4,854,600 views

Morning Glory (2010) Movie Review

by christinculturecom

22 views

The Real Housewives Of Atlanta Season 2 Episode...

by RealityTVNetwork

15,354 views

My Top 30 Couple Dances of S5 #10-6

by canadiana

1,027 views

The Quigley Formula - Part 2 of 8

by MCDHTX

<http://www.youtube.com/watch?v=dwGOJw2gcA>

1/27/2011

Exhibit F

From: Mike Meier [<mailto:Mike.Meier.Esq@InternationalLawGroup.com>]
Sent: Friday, July 30, 2010 7:15 AM
To: Putnam, Marvin
Cc: Mike Meier
Subject: Re: CONFIDENTIAL - Preiss v. S&R - Crime of "sexual assault"

Dear Marvin:

In case we are unable to speak today, we another major problem. We have received advisement from a Las Vegas law firm:

Section on "crimes against the person" in Nevada: <http://www.leg.state.nv.us/nrs/NRS-200.html#NRS200Sec364>

CHAPTER 200 - CRIMES AGAINST THE PERSON

NRS 200.364 Definitions. As used in NRS 200.364 to 200.3784, inclusive, unless the context otherwise requires:

3. "Sexual offense" means any of the following offenses:

(a) Sexual assault pursuant to NRS 200.366. ...

4. "Sexual penetration" means cunnilingus, fellatio, or any intrusion, however slight, of any part of a person's body or any object manipulated or inserted by a person into the genital or anal openings of the body of another, including sexual intercourse in its ordinary meaning.

NRS 200.366 Sexual assault: Definition; penalties.

1. A person who subjects another person to sexual penetration, or who forces another person to make a sexual penetration on himself or herself or another, or on a beast, against the will of the victim or under conditions in which the perpetrator knows or should know that the victim is mentally or physically incapable of resisting or understanding the nature of his or her conduct, is guilty of sexual assault.

2. Except as otherwise provided in subsections 3 and 4, a person who commits a sexual assault is guilty of a category A felony and shall be punished:

(a) If substantial bodily harm to the victim results from the actions of the defendant committed in connection with or as a part of the sexual assault, by imprisonment in the state prison:

(1) For life without the possibility of parole; or

(2) For life with the possibility of parole, with eligibility for parole beginning when a minimum of 15 years has been served.

(b) If no substantial bodily harm to the victim results, by imprisonment in the state prison for life with the possibility of parole, with eligibility for parole beginning when a minimum of 10 years has been served.

....

Regards/Mit freundlichen Grüßen

Mike Meier

International Law Group, LLC

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eFax: (202) 747-5795

Email: mike.meier.esq@internationallawgroup.com

Website: www.internationallawgroup.com